



USA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 8890

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Salvador BARAJAS Cruz,  
Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about October 29, 2007, within the Southern District of California, defendant Salvador BARAJAS Cruz, did knowingly and intentionally import approximately 13.22 kilograms (29.08 pounds) of Marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

LORENA MULVIHILL  
Special Agent  
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, October 30, 2007.

  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Salvador BARAJAS Cruz

4 STATEMENT OF FACTS

5 This complaint is based on the personal observations, investigation, and information  
6 furnished to U.S. Immigration and Customs Enforcement Special Agent Lorena Mulvihill.

7 On October 29, 2007, at approximately 1754 hours, Customs and Border Protection  
8 Officer (CBPO) D. Pizano was assigned to primary lanes at the Calexico, California West Port of  
9 Entry when a 1991 white Ford Explorer bearing California license plate 5YKB624 approached  
10 for entry.

11 CBPO D. Pizano encountered the operator, registered owner and sole occupant of the  
12 vehicle identified as Salvador BARAJAS Cruz. CBPO D. Pizano received a negative Customs  
13 declaration from BARAJAS and referred BARAJAS and the vehicle to the vehicle secondary lot  
14 for further examination.

15 In the vehicle secondary area, Customs Border Protection Canine Enforcement Officer  
16 D. Ragsdale was conducting a Block Blitz operation with his Narcotic Detector Dog (NDL).  
17 The NDD alerted to a 1991 white Ford Explorer bearing California license plate 5YKB624.

18 CBPO E. Garcia assumed responsibility for searching the vehicle. During examination of  
19 the vehicle, CBPO E. Garcia discovered several packages concealed with in the dashboard area  
20 of the vehicle. CBPO E. Garcia probed a package exposing a green leafy substance, which field-  
21 tested positive for marijuana. A total of twenty (17) packages, with a total weight of 13.22  
22 kilograms (29.08 pounds) were removed from the vehicle.

23 BARAJAS was advised of his rights per Miranda. BARAJAS stated that he understood  
24 his rights and was willing to waive his rights and make a statement. BARAJAS admitted  
25 knowledge of the marijuana found in the vehicle. BARAJAS stated he was to be paid \$500.00  
26 for this smuggling venture.  
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